

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN

HERMAN WILLIAM HIGHSHAW

Plaintiff,

v.

Case No. 19-CV-1547

JACOB MARTIN,
ANTHONY WATKINS,
SERENA SMITH, and
LAURA SUKOWATY,

Defendants.

**DEFENDANTS' NOTICE OF MOTION AND MOTION TO DISMISS
PURSUANT TO FED. R. CIV. P. 12(b)(6)**

PLEASE TAKE NOTICE that Defendants Jacob Martin and Anthony Watkins, by their attorneys, Milwaukee County Office of Corporation Counsel, by Assistant Corporation Counsel Dale R. Nikolay, hereby moves the Court, the Honorable Lynn Adelman presiding, for an order granting dismissal of plaintiff's complaint (ECF No. 1) based on plaintiff's failure to state a claim against Martin and Watkins, pursuant to Fed. R. Civ. P. 12(b)(6). This motion is based upon the accompanying supporting brief, as well as all the pleadings filed in this matter to date.

Dated at Milwaukee, Wisconsin this 1st day of June, 2020.

MARGARET C. DAUN
Milwaukee County Corporation Counsel

By: s/ Dale R. Nikolay
DALE R. NIKOLAY
Wisconsin Bar No. 1002447
Assistant Corporation Counsel
Attorney for defendants, Jacob Martin, Anthony
Watkins, and Serena Smith

P.O. Mailing Address:

Milwaukee County Office of Corporation Counsel
901 North 9th Street, Room 303
Milwaukee, WI 53233
Telephone: (414) 278-4087
Facsimile: (414) 223-1249
Email: dale.nikolay@milwaukeecountywi.gov